EXPLANATION OF SIGNIFICANT DIFFERENCES

L.E. CARPENTER/DAYCO CORPORATION SITE

Site Name and Location

L.E. Carpenter/Dayco Corporation
Wharton Borough
Morris County, New Jersey

Introduction

The purpose of this Explanation of Significant Differences (ESD) is to explain the changes made by the New Jersey Department of Environmental Protection (NJDEP) and United States Environmental Protection Agency (EPA) to the remedy selected in the April 1994 Record of Decision (ROD) for the L.E. Carpenter/Dayco Corporation Superfund Site (L.E. Carpenter site or Site).

EPA issues this ESD in accordance with Section 117(c) of the Comprehensive Environmental Response, Compensation & Liability Act of 1980 (CERCLA), as amended, 42 U.S.C. §9617(c), and Section 300.435(c)(2)(i) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 C.F.R. §300.435(c)(2)(i). NJDEP concurred on this ESD through correspondence dated _____.

The ESD and documents that provide the basis of the ESD decision will be incorporated into the Administrative Record for the Site in accordance with Section 300.825(a)(2) of the NCP. The Administrative Record is available for review during business hours at EPA Region 2, 290 Broadway, New York, NY 10007 and at the information repository in the NJDEP Offices in Trenton, New Jersey.

Summary of Site History, Contamination Problems, and Selected Remedy

The L.E. Carpenter site is located at 170 North Main Street, Borough of Wharton, Morris County, New Jersey. The Site occupies approximately 14.6 acres, and is located northwest of the intersection of the Rockaway River and North Main Street.

The L.E. Carpenter site includes buildings, warehouses, and remnants of disposal areas that are associated with a former

treat system, with a portion of the treated groundwater to be recirculated within a capture zone, another portion to be discharged into a deeper aquifer in accordance with groundwater discharge criteria, and another portion to be treated via biological treatment;

3. Excavation and consolidation of bis (2-ethlyhexyl) phthalate (DEHP) contaminated soils into a soil treatment zone;
4. Reinfiltration of a portion of treated groundwater (with added oxygen and nutrients) into the unsaturated soil treatment zone via perforated piping to allow in-situ bioremediation of contaminated soils;
5. Installation of a vegetative soil cover for the area of the groundwater infiltration system;
6. Spot excavation and disposal of soils containing Polychlorinated biphenols (PCBs), lead and antimony, where levels exceed the soil cleanup levels in locations other than the east soils area designated as the disposal area;
7. Excavation of disposal area sludges/fill, which may inhibit in situ treatment; and
8. Establishment of environmental use restrictions on the property.

Post ROD Activities

Soils and Floating Product

Since the issuance of the 1994 ROD, a number of activities have taken place. In 1995, a site-wide delineation of lead impacted soils revealed that lead contamination was more extensive than previously anticipated. Lead was the most widespread contaminant in site soils. In December of 1997, the floating product removal system that was installed in 1982 was replaced with a new system, because removal of floating product occurred at a much slower pace than originally anticipated and had not yet been completed. After several years, the new floating product removal system was still found to be slow and inefficient.

Based on data collected after the ROD, NJDEP, EPA and L.E. Carpenter agreed that modifications to portions of the remedy related to soils and the floating product were warranted.

being consolidated into a soil treatment zone;

4. no reinfiltration of treated groundwater will be performed for the purpose of treating soil contamination, as all contaminated site soils were excavated to meet cleanup standards and disposed of off-site;

5. following implementation of the source reduction remediation, all disturbed areas were restored to proposed final grades with a vegetative soil cover. The ROD selected a vegetative cover over the area of groundwater infiltration;

6. excavation and off-site disposal of soils containing PCBs and lead were completed to meet more stringent New Jersey Residential Direct Contact Soil Cleanup Criteria (RDCSCC) (0.49 ppm and 400 ppm, respectively) instead of the Non- Residential Direct Contact Soil Cleanup Criteria (NRDCSCC) (2.0 ppm and 600 ppm, respectively) as required in the ROD;

7. all soils above site-established cleanup levels were excavated and disposed of off-site during the source reduction remediation, instead of the excavation of some soils and on-site treatment through flushing of other soils as selected in the ROD;

8. environmental use restrictions on the property as selected in the ROD are no longer needed since RDCSCC were met for PCBs and lead at the site.

It should be noted that while most of the site soils were excavated to levels below the water table, thereby removing all contaminants, there is a limited area of soils in the southwest corner of the site, called the B-2 area, where soils were excavated to a depth of 2 feet and the excavation was then backfilled with clean fill. Two post-excavation samples collected at the base of this excavation in this area exceeded the NJDEP residential soil cleanup goal for antimony of 14 ppm. The concentrations of antimony collected at the base of the excavation are well below NJDEP's non-residential cleanup goal, and are covered with two feet of clean soil. Based on a review of all post-excavation samples of this limited area, EPA and

Public Participation Activities

In accordance with the NCP, a formal public comment period is not required when issuing an ESD. However, EPA will announce the availability of the ESD in a local newspaper of general circulation. The ESD has been placed in the site file and the information repository at the NJDEP Offices in Trenton, New Jersey.

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George Pavlou, Director Date
Emergency & Remedial Response Division